



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*United States District Courthouse
300 Quarropas Street
White Plains, New York 10601*

September 22, 2020

BY ECF

The Honorable Cathy Seibel
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Re: *United States v. Maria Luisa Estrella Jaidi, 19 Cr. 890 (CS)*

Dear Judge Seibel:

The Government respectfully submits this letter to request a two-week extension of its time to respond to defendant's motions. Defense counsel consents to the proposed extension.

During the previous status conference in this case, on June 18, 2020, the Court set the following briefing schedule: (1) defendant's motions due September 18, 2020; (2) Government's opposition due October 16, 2020; (3) defendant's reply due October 30, 2020; and (4) "[t]he Court will issue a ruling from the Bench as to Defendant's motions on December 8, 2020." *See* Dkt. Minute Entry (June 18, 2020). Three months later, on September 18, 2020, the defendant filed five separate motions, five separate accompanying briefs, and three separate declarations with twenty-five exhibits attached. *See* Dkt. Nos. 41-53. In total, the defendant filed approximately 387 pages of materials, including approximately 109 pages of legal briefing.

In order to adequately address these arguments, including, among other things, by conferring with agents and IT experts about discovery and technical issues, the Government respectfully requests a two-week extension of its deadline, until October 30, 2020. The proposed extension would give the Government a total of 42 days to respond to defendant's motions, which is less than half the 92 days the defendant had to file the motions. And because the trial is not scheduled until March 1, 2021, and the defendant is not detained, she would not be prejudiced by the Government's request.

Consistent with the proposed extension, the Government respectfully requests that the defendant's deadline to file a reply be extended two weeks to November 13, 2020.

The Government has not previously requested an extension.

Respectfully submitted,

AUDREY STRAUSS
Acting United States Attorney

By:

/s/

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cc: Defense Counsel (by ECF)

Application granted. Government's opposition to motions due 10/30/20. Defendant's reply due 11/13/20.
Bench ruling adjourned to 12/21/20 at 10 am.

SO ORDERED.


CATHY SEIBEL, U.S.D.J.

9/23/20